15

16

17

18

19

20

21

22

23

26

27

28

1	Jarrod L. Rickard, Esq., Bar No. 10203
2	Email: jlr@semenzarickard.com
2	Katie L. Cannata, Esq., Bar No. 14848
3	Email: klc@semenzarickard.com
	SEMENZA RICKARD LAW
4	10161 Park Run Drive, Suite 150
5	Las Vegas, Nevada 89145 Telephone: (702) 835-6803
3	Facsimile: (702) 920-8669
6	1 desimile. (702) 520 0005
_	Attorneys for Defendant Nathan Park
7	
8	UNITED S
	DV
9	DIS
10	
	MODERN EMINENCE, LLC, MODE
11	
	FURTRESS, INC. AND ALLREALM
12	FORTRESS, INC. AND ALLREALM
12	Plaintiffs,
12 13	

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LC, MODERN LREALMS, INC.,

NATHAN PARK,

Defendant.

Case No. 2:24-cv-00348-CDS-EJY

STIPULATION AND ORDER TO EXTEND DEADLINE FOR **DEFENDANT TO RESPOND TO** AMENDED COMPLAINT

Defendant Nathan Park ("Park"), by and through his counsel of record, Jarrod L. Rickard, Esq. with the law firm of Semenza Rickard Law, and Plaintiffs Modern Eminence, LLC, Modern Fortress, Inc. and AllRealms, Inc., (collectively, "Plaintiffs"), by and through their counsel of record John P. Desmond with the law firm of Dickinson Wright PLLC, (together, the "Parties"), hereby stipulate and agree, subject to this Court's approval, as follows:

WHEREAS, Plaintiffs filed their Amended Complaint in this matter on March 27, 2024;

24 WHEREAS, Defendant was served with the Summons and Amended Complaint on April

25 25, 2024;

> WHEREAS, the undersigned counsel for Defendant was retained on Wednesday, May 15, 2024, and the current deadline to file a responsive pleading to the Amended Complaint is Thursday, May 16, 2024;

Case 2:24-cv-00348-CDS-EJY Document 15 Filed 05/16/24 Page 2 of 2

WHEREAS, Plaintiffs have agreed to provide the Defendant up to and including May 20, 1 2 2024, to respond to Plaintiffs' Amended Complaint in order to provide Defendant's counsel time 3 to get up to speed; and WHEREAS, this is the first request filed with this Court to extend the time for the 4 Defendant to respond to Plaintiffs' Amended Complaint and Defendant has requested the 5 extension in good faith and not to delay this matter. 6 ACCORDINGLY, the Parties hereby request that the Court grant this Stipulation to 7 extend the deadline for Defendant to file a responsive pleading to the Amended Complaint until 8 May 20, 2024. 9 This Stipulation is made in good faith and is not made for the purpose of delay. The 10 Parties agree that good cause exists for this continuance. 11 DATED this 16th day of May, 2024. DATED this 16th day of May, 2024. 12 13 SEMENZA RICKARD LAW DICKINSON WRIGHT PLLC 14 /s/ John P. Desmond /s/ Jarrod L. Rickard Jarrod L. Rickard, Esq., Bar No. 10203 John P. Desmond, Esq, Bar No. 5618 15 Katie L. Cannata, Esq., Bar No. 14848 100 West Liberty Street, Suite 940 10161 Park Run Drive, Suite 150 Reno, Nevada 89501 16 Las Vegas, Nevada 89145 17 Attorneys for Plaintiffs Modern Eminence, Attorneys for Defendant Nathan Park 18 LLC, Modern Fortress, Inc. and AllRealms, Inc. 19 20 **ORDER** 21 22 IT IS SO ORDERED. 23 24 25 May 16, 2024 DATED: 26 27 28